

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

2019 OCT 17 AM 9:13
U.S. DISTRICT COURT CLERK
NORTHERN DISTRICT
OF INDIANA

TONJIA WINGO,)
)
Plaintiff,)
) CASE NO. 3:19-CV-00351-JD-MGG
V.)
)
)
RITE OF PASSAGE DePaul,)
ACADEMY)
Defendant.)

PLAINTIFF'S RESPONSE TO INTERROGATORIES

INTERROGATORY NO. 1: TONJIA CORAY WINGO; MAY 5, 1967;
313-76-1310..24581 Nash Ave. South Bend, IN 46619.

INTERROGATORY NO. 2: The fact that I was terminated do to alleged medical reasons of me not being able to perform my job....inception date is around the first week in July....thru October 2, with the presentation of yet more of the same forms to be signed by my physician again which transcended to me being told I had to leave the job until the document stating that I acknowledged that the forms had to be signed by my doctor and retuned a week later, all documents were signed that same evening in front of my immediate supervisor and turned in, yet I was still not permitted to return to work, I also spoke with the shift supervisor (Anthony KaHill) the very same evening and informed him to the days activities which is was not aware of and he spoke with the director of R.O.P. (Ike Shipmen) whom was supposed to call me that same evening as to me being able to return to work and complete my shift and my implement, yet Mr. Shipmen never followed through with reaching out to me...on October 25th I was terminated from my job with R.O.P. ; All of the administrators and supervisors that were involved were Director Ike Shipmen, Human Resource Director Michelle Ruth, Shift Supervisor Anthony KaHill, and Group Leader Yul Thomas.

INTERROGATORY NO. 3 Tonjia C. Wingo v. Arrowhead Investment....07CV0419....I was the Plaintiff....out of court settlement.

INTERROGATORY NO. 4: Criminal conversion.

INTERROGATORY NO. 5: No.

INTERROGATORY NO. 6: Shift Supervisor Anthony KaHill and Group Leader Yul Thomasthe facts of events that took place.

INTERROGATORY NO. 7: Doctor Maureen Ziboh...my physician...whom is licensed professional, who has practiced for many years.

INTERROGATORY NO. 8: None

INTERROGATORY NO. 9: Compliant, company policies, Governmental policies, doctors notices, interrogatories, request for admissions, all company correspondence to the case at bar.

INTERROGATORY NO. 10: Being told I had to complete forms already established of which the individual that completed the form did not request any more accommodations and when this fact was made know to H.R. Ruth, I was told "it is company policy".... upon requesting said policy I was then told by H.R. Ruth, "it is not a company policy, it is an ADA policy"....then being corhushed into signing a document right now or I could not remain at work without signing papers I stated I was not comfortable signing without proper examination of said documents.

INTERROGATORY NO. 11: a) five (5) million dollars, b) mental anguish, pecuniary losses, pursuit of life, liberty, and happiness, c) current and future losses, d) the taking of my job bring on hardships in my life. E) the beginning of July 2019 to October 25th 2019.

INTERROGATORY NO. 12 Dr. Maureen Ziboh.

INTERROGATORY NO. 13: conversation with R.O.P. employees at football practice for my son and the same team student /athletes , interns and Rams play for the Osceola Grace church football team....conversations were about the football team.

INTERROGATORY NO. 14: Miami Homecare Services...heard about it from a family member....started January 1st 2019....\$9.50 an hour.

INTERROGATORY NO. 15: Volunteered from 2/1999 to 4/2000; Seasonal Employment (Recreation Aid) from 5/1/2000 to 9/30/2000. Youth Sports Coordinator . 8/26/2002 to 7/10/2009..Wal-Mart, maintenance ,a better opportunity. Plasma Center, medical screener...South Bend Community School Corp, current, sub-teacher....Miami Homecare Services, Dixon Mwose current.

INTERROGATORY NO. 16: Being diabetic

INTERROGATORY NO. 17: Diabetes...which did not keep me from performing my job duties.

INTERROGATORY NO. 18: On approved ADA and FMLA accommodations which provide job security.

INTERROGATORY NO. 19: unemployment insurance and a job.

INTERROGATORY NO. 20: Plenty of fish.

INTERROGATORY NO. 21: marked filed May 6th 2019.

INTERROGATORY NO. 22: The list of duties under essential functions were performed.

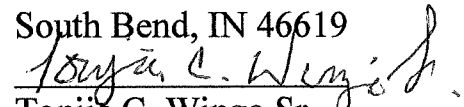
INTERROGATORY NO. 23: The job in question is not a job that required a physical test to obtain said job as a pre-job requirement as the military, law enforcement and other types of similar jobs that require a potential applicant whom would need to pass a physical test to become an employee of Rite of Passage.

INTERROGATORY NO. 24: date mailed Feb. 11, 2019.

INTERROGATORY NO. 25: complaint form....policies form R.O.P. , and governmental policy.

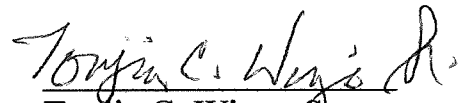
The undersigned submits under the penalties for perjury that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

Respectfully Submitted,
Tonjia C. Wingo Sr.
24581 Nash Ave.
South Bend, IN 46619


Tonjia C. Wingo Sr.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon Vincent P. Antaki #22260-15 Remingger CO. L.P.A. College Park Plaza 8909 Purdue Road, Ste. 200 Indianapolis, IN 46268 by depositing the same in the United States mail, certified mail this 17th day of October 2019.


Tonjia C. Wingo Sr.